

**IN THE UNITED STATES DISTRICT COURT  
NORTHERN DISTRICT OF ILLINOIS  
EASTERN DIVISION**

SHONAREE JONES,

Plaintiff,

VS.

THE PRUDENTIAL INSURANCE  
COMPANY OF AMERICA,

Defendant.

Case No. 1:23-cv-6382

Hon. Matthew F. Kennelly

Magistrate Judge Sunil R. Harjani

## **PLAINTIFF'S RULE 52 MOTION FOR ENTRY OF JUDGMENT**

Now comes Plaintiff, SHONAREE JONES, by and through her undersigned attorney, pursuant to [Federal Rule of Civil Procedure 52](#), moves for entry of judgment in her favor and against Defendant. In support thereof, Plaintiff submits Plaintiff's Proposed Findings of Fact (Dkt. No. 30) and Memorandum of Law (Dkt. No. 31).

The Court should grant Plaintiff's Motion for Entry of Judgment and award her past due disability benefits, prejudgment interest payable thereon, and a declaratory judgment clarifying her right to future benefits, so long as she meets the policy's terms and conditions. [29 U.S.C. § 1132\(a\)\(1\)\(B\)](#). Plaintiff seeks benefits due to her since April 20, 2023 in the amount of \$1,874.60 per month. (Dkt. No. \_\_\_, Plaintiff's Proposed Findings of Fact, ¶ 19). In addition, Plaintiff seeks pre-judgment interest at the current prime rate thereon. Though Plaintiff sought attorney's fees and costs under [29 U.S.C. § 1132\(g\)](#) in the Complaint, Plaintiff reserves addressing that claim until after a decision on the merits, and pursuant to the procedures of Local Rule 54.3.

WHEREFORE, Plaintiff prays judgment be entered on her behalf, and the Court enter and Order that:

- A. Defendant must pay Plaintiff \$1,874.60 dating back to April 20, 2023;
- B. Defendant must pay Plaintiff prejudgment interest at the current prime rate on all past due benefits;
- C. Plaintiff shall remain entitled to long-term disability benefits in the amount of \$1,874.60 per month so long as she remains disabled under the terms of the group insurance policy and certificate of insurance.

Respectfully Submitted,

/s/ Michael Bartolic  
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**CERTIFICATE OF SERVICE**

The undersigned attorney hereby certifies that a true and correct copy of the foregoing was served upon all counsel of record via the Electronic Filing System of the U.S. District Court for the Northern District of Illinois on March 20, 2024.

/s/ Michael Bartolic  
Michael Bartolic